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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

S.S., an individual,

Plaintiff,

vs.

NUZHAT ALI, an individual;
WAHAB FALAK, an individual;
VEENA FALAK, an individual;
ALEENA FALAK, an individual;
RUKHSAR ALI, an individual;
KHUBAIB FALAK, an individual;
and DOES 1-10, INCLUSIVE,

Defendants.

Case No. 3:23-cv-5074

**PLAINTIFF'S ADMINISTRATIVE
MOTION TO SEAL DECLARATION IN
SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION TO
PROCEED UNDER PSEUDONYM**

Date:
Time:
Dept:
Judge:

Pursuant to Civil Local Rules 7-11 and 79-5, Plaintiff S.S. (“Plaintiff”) hereby moves for administrative relief to file, under seal, the Declaration of S.S. in support of Plaintiff’s Administrative Motion to Proceed Under Pseudonym (the “Motion”). Plaintiff files this Motion at the outset of her lawsuit in which she seeks justice and civil damages from her former mother-in-law, ex-husband, and their family, who successfully lured Plaintiff to the United States through an arranged marriage that turned out to be a sham.

This Motion is filed for the purpose of protecting Plaintiff from reputational harm, such as reduced social standing and economic opportunities, alienation and shunning in Plaintiff’s Pakistani-American community, some of whom consider divorce and any outing of abuses by other community members, to be taboo, particularly intimate abuses like those addressed in this case. *See* Declaration of Derek Mayor in Support of this Motion, Exh. 1 (S.S. Declaration ¶ 30). Plaintiff is also fearful of reputational harm and shunning that may be inflicted on her family in Pakistan. *See id.* This Motion is supported by the Declaration of Derek Mayor.

Accordingly, Plaintiff submits this motion to seal.

Dated: October 3, 2023

PILLSBURY WINTHROP SHAW
PITTMAN LLP

/s/ CHRISTOPHER KAO
By: CHRISTOPHER KAO
BROCK S. WEBER
DEREK M. MAYOR

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